

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA <i>ex</i>)	
<i>rel.</i> KAMAL MUSTAFA AL-SULTAN,)	
)	
Plaintiff/Relator,)	
)	
v.)	CIVIL CASE NO.
)	1:05-CV-02968-TWT
THE PUBLIC WAREHOUSING)	
COMPANY, K.S.C., <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT THE PUBLIC WAREHOUSING COMPANY, K.S.C.’S
MOTION TO TRANSFER VENUE TO THE EASTERN DISTRICT OF
PENNSYLVANIA, PURSUANT TO 28 U.S.C. § 1404(a)**

COMES NOW Defendant The Public Warehousing Company, K.S.C., a/k/a Agility (“PWC”), specially appearing by and through its counsel, and hereby submits this Motion to Transfer Venue to the Eastern District of Pennsylvania, Pursuant To 28 U.S.C. § 1404(a).¹ This motion is based on the attached

¹ PWC is specially appearing here solely to seek transfer of venue to the Eastern District of Pennsylvania, pursuant to 28 U.S.C. § 1404(a). The filing of this motion does not constitute an admission that service has been proper or that this Court has jurisdiction over this case or PWC. Although PWC will continue to specially appear until this motion is resolved, for the Court’s convenience, PWC

(cont’d)

memorandum of law, the declarations and exhibits attached thereto, and any evidence or argument that may be presented at a hearing on this matter.

Dated: July 18, 2016

Respectfully submitted,

s/ Richard Marmaro

Richard Marmaro (admitted *Pro Hac Vice*)

Cal. Bar No. 091387

Matthew E. Sloan (admitted *Pro Hac Vice*)

Cal. Bar No. 165165

Emily Ludmir Aviad (admitted *Pro Hac Vice*)

Cal. Bar No. 251995

SKADDEN ARPS SLATE MEAGHER & FLOM LLP

300 S. Grand Avenue, Suite 3400

Los Angeles, California 90071-3144

Telephone: (213) 687-5000

Facsimile: (213) 687-5600

Dated: July 18, 2016

Respectfully submitted,

s/ Kristin N. Tahler

Kristin N. Tahler (admitted *Pro Hac Vice*)

QUINN EMANUEL URQUHART & SULLIVAN, LLP

865 S. Figueroa St., 10th Floor

Los Angeles, California 90017

Telephone: (213) 443-3000

Facsimile: (213) 443-3100

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will not repeat this statement of special appearance in future briefing on this motion.

Dated: July 18, 2016

Respectfully submitted,

s/ Richard H. Deane, Jr.

Richard H. Deane, Jr.

Ga. Bar No. 214875

Lucas W. Andrews

Ga. Bar No. 019533

JONES DAY

1420 Peachtree Street, N.E., Suite 800

Atlanta, Georgia 30309-3053

Telephone: (404) 521-3939

Facsimile: (404) 581-8330

Attorneys for Defendant

The Public Warehousing Company, K.S.C.

LOCAL RULE 5.1 CERTIFICATION

I hereby certify that this document has been prepared in Times New Roman 14-point font in accordance with Local Rule 5.1.

Dated: July 18, 2016

Respectfully submitted,

s/ Richard Marmaro

Richard Marmaro

Attorney for Defendant

The Public Warehousing Company, K.S.C.

CERTIFICATE OF SERVICE

I hereby certify that on this day I have caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filings to all counsel of record.

This 18th day of July, 2016.

s/ Richard Marmaro

Richard Marmaro